

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

METROPOLITAN  
WOODWORKING, INC.  
METROPOLITAN  
ARCHITECTURAL WOODWORK,  
LLC., SPRINGFIELD OFFICE,  
CORP. SPRINGFIELD WOOD  
WORKSHIP, CORP.,  
CONSTRUCTION MACHINE  
DEVICES, LLC., AND DARREN  
COMMANDER,

Plaintiffs,

v.

SHAWN M. LATOURETTE IN HIS  
OFFICIAL CAPACITY AS  
COMMISSIONER OF THE NEW  
JERSEY DEPARTMENT OF  
ENVIRONMENTAL PROTECTION;  
AND MATTHEW PLATKIN IN HIS  
OFFICIAL CAPACITY AS  
ATTORNEY GENERAL OF THE  
STATE OF NEW JERSEY, PETER  
MADAN

Defendants.

**Civil Action**

HON. CLAIRE C. CECCHI, U.S.D.J.

Civil Action No. 24-07483


CERTIFICATION OF JEFFREY MEYER  
BUREAU CHIEF NEW JERSEY DEPARTMENT OF ENVIRONMENTAL  
PROTECTION DIVISION OF AIR ENFORCEMENT

I, Jeffrey Meyer, of full age, certify and say:

1. I am employed as Manager 4 Environmental Protection Technical/Scientific/Engineering by the New Jersey Department of Environmental Protection (“Department”) in the Division of Air Enforcement.
2. Within that Division, I work as the Bureau Chief in the Northern Regional Office of Air Enforcement with responsibilities that include overseeing a staff of 21 employees for the enforcement of Air Pollution Regulations for the Department.
3. I have been with the Department for over 36 years in what is now titled the Division of Air Enforcement for. My tenure began with the Department on September 26, 1988.
4. I have reviewed the relevant documents in this matter and submit this certification in further support of the Department’s Motion to Dismiss.
5. I supervised Peter Madan during his employment with the Department. I began supervising Peter Madan in December 25, 2015, and continued supervising him until his retirement on May 1, 2023.
6. Peter Madan was not employed by the Department in March 2024.
7. I learned of the alleged March 2024 incident after Plaintiff’s filed a Municipal Summons against Peter Madan on May 29, 2024.

8. I nor anyone in my office directed Peter Madan to go to Darren Commanders property after his separation from the Department in May of 2023.
9. Any alleged conduct by Peter Madan in March 2024 was not to further assist the Department, as he was no longer employed by the Department.
10. The Department had no control over Peter Madan after his separation from the Department in May 2023, therefore.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements by me are willfully false, I am subject to punishment.

By:   
Jeffrey Meyer  
Bureau Chief  
Division of Air Enforcement

Dated: June 11, 2025